

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

OCT 18 2018

UNITED STATES DISTRICT COURT
EASTERN DISTRICT
LUFKIN DIVISION

PRELIMINARY INJUNCTION

BY
DEPUTY

COMES NOW Robert Charles Jackson with his Preliminary Injunction in support of his motion for Joinder. Showing in his Injunction Reports of sickness from consuming toxic water on Eastham Unit. These Reports are all connected to Reference Number 17D168682300001 and INQ Letter from BRYAN Collier, Executive DIR. Number to said letter is 17-5656-02. The consumption of the toxic water caused sickness and nausea. And my voicing to receive treatment caused a bad disciplinary which took away privileges. And sent me to lockup while I was sick on 2-17-17. The water has caused multiple offenders to be diagnosed with H-Pylori and we all have to drink it because there is no other alternative for water here to drink. This issue raises 8th Amendment concerns. And the Supreme Court has held that unsafe conditions which poses an unreasonable risk of serious damages to a prisoner's future health may violate the 8th amdt. even if damage has not occurred and may not effect every prisoner exposed to the conditions. Helling v. McKinney 509 U.S. 25, 33, 113.

S.Ct. 2475 (1993). ("a remedy for unsafe conditions need not wait a tragic event") In the case here multiple offenders have been diagnosed with this disease "H-Pylori" which destroys the lining of the stomach. And there is no cure for it. There has even been signs posted on this unit to not drink this water without boiling it. Yet, IF they know we have no way to boil it. And we still need water what are they doing to make sure we have water? Nothing is being done for it. I'm being deprived of a basic need of safe drinking water. And these prison officials knew and still know that this water system is old and corrupt on Eastham. I was injured and still keep getting sick due to this deprivation of safe drinking. This report number above when verified will show that the Rank on Eastham, also the Executive Director knew of my reported sickness. And did not respond reasonably by getting to the root of the problem of unsafe drinking water. And the denial of that basic need caused my sickness.

I was injured due to this deprivation of basic human need and was throwing up and dehydrated. Fever. 2.17.17. FARMER V. BRENNAN 511 U.S. 825 (1994)
Wilson V. Seiter 501 U.S. 294 (1991). To meet the objective Eighth Amendment standard you need to show that you were deprived of a basic human need or exposed to serious harm. Under ~~IS~~ subjective standard you must show that the prison official that you are suing knew that you were being deprived or harmed and did not respond reasonably. You must also show how you were injured and prove that the denial of a basic need caused your injury. The objective and subjective has been met by exhibits filed in Skinner V. Collier 9:18-CV-00139. In this case the two standards are met. These same issues are challenged in Wells 9:17-CV-80. And IF this water here is OK why do the officials on Eastham Post notices for us to boil this water before attempting to drink it?

In conclusion, I pray that this court will issue an injunction that T.D.C.S. will issue each inmate here clean drinking water as issued in Cole V. Livingston U.S. D.C. (S.D. TEXAS). Case No. 4:14-cv-01698. —
— 2016 U.S. DIST LEXIS 80345

According to the UNITED NATIONS "The human right to water... [is] indispensable for leading a human life in dignity..."

In The interest of Justice this INJUNCTION I Pray Will Be Granted.

Respectfully Submitted

Robert Charles Jackson #1686823

Robert Charles Jackson

Eastham Unit 2665 Prison Rd #1
Lowell, TX. 75851

Executed: 10-12-18